UNITED STATES DISTRICT CO	OURT
DISTRICT OF NEW JERSEY	

UNITED STATES OF AMERICA,

-against-

Crim No. 09-558 (DRD)

RASHAWN BILLUPS,
a/k/a "Rashawn Bond,"
a/k/a "Shawney,"
ALMIESHA BILLUPSi,
a/k/a "Me-Me,"
RAYSHAWN ROSS,
a/k/a "Dre," and
AL-RASCHID GORDON,
a/k/a "Sheed,"

Defendants

## CONSENT MOTION TO ENLARGE TIME FOR FILING PRETRIAL MOTIONS

ALMIESHA BILLUPS, by her undersigned counsel, and with the consent of all counsel and the government, moves for a one week adjournment of the motion schedule in this case.

She is supposed to refrain from working and has been unable to work well for the past  $2\frac{1}{2}$  weeks.

If this adjournment is granted, the schedule would be as follows: (1) Defense motions would be due on Monday, November 16, 2009; and (2) The government's Response would be due on Monday, December 7, 2009

Because the pretrial hearings in this case originally were scheduled to be held on Monday, December 7, 2009, those would have to be adjourned to a date set by the Court.

In support of this motion, counsel states that she became ill on October 10, 2009. On Monday, October 26, 2009, counsel was diagnosed with pneumonia and asthmatic bronchitis. As

a consequence, she is supposed to limit her work and avoid physical exertion and stress.

The government and all co-counsel have consented to this motion.

Respectfully submitted,

ALMIESHA BILLUPS by her attorney

Dated: October 30, 2009

/s/ Ruth M. Liebesman

Ruth M. Liebesman, Esquire (RL 5383)

460 Myrtle Avenue

Fort Lee, New Jersey 07024

201-617-7000 201-617-7710

## CERTIFICATE OF SERVICE

RUTH M. LIEBESMAN, an attorney-at-law duly licensed to practice law before this Court, hereby certifies that, on the date set forth below, she caused a copy of the foregoing motion to be served on the following persons by causing copies to be sent to them via the Court's ECF filing system, and via first class mail, postage prepaid, to:

John P. McGovern, Esquire 221 Washington Street, 2<sup>nd</sup> floor Newark, New Jersey 07102 Attorney for Rayshawn Ross

Richard J. Verde, Esquire 704 Passaic Avenue Post Office Box 401 West Caldwell, New Jersey 07006 Attorney for Al-Raschid Gordon

Roy B. Greenman, Esquire Budin, Greenman and Greenman 1379 Morris Avenue Union, New Jersey 07083 Attorney for Rashaun Billups

Lisa Colone, Esquire Assistant United States Attorney 970 Broad Street Newark, New Jersey 07102

In addition, a courtesy copy was served by regular mail on:

The Hon. Dickinson R. Debevoise United States District Judge Dated: October 30, 2009

Mohum Fronter

William Fronter

11/4/09 50 Walnut Street Newark, New Jersey 07101

/s/ Ruth M. Liebesman

Ruth M. Liebesman, Esquire (RL 5383)

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